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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

DISABILITY RIGHTS OREGON,  
METROPOLITAN PUBLIC DEFENDER  
SERVICES, INC., and A.J. MADISON,

*Plaintiffs,*

v.

DAVID BADEN, in his official capacity as head  
of the Oregon Health Authority, and DOLORES  
MATTEUCCI, in her official capacity as  
Superintendent of the Oregon State Hospital

*Defendants.*

3:02-cv-00339-MO

**NOTICE OF APPEAL**

Notice is given that Marion County hereby appeals to the United States Court of Appeals for the Ninth Circuit from the order denying its motion to intervene (ECF No. 415) entered in this matter on June 29, 2023. Attached to this notice is the representation statement required by Federal Rule of Appellate Procedure 12(b) and Ninth Circuit Rule 3-2.

Dated this 27th day of July , 2023

Respectfully submitted,

JANE E. VETTO  
MARION COUNTY LEGAL COUNSEL

/s/Jane Vetto

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Jane E. Vetto, OSB #914564  
Marion County Legal Counsel  
Attorney for Defendants Marion County

**UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

**Form 6. Representation Statement**

*Instructions for this form: <http://www.ca9.uscourts.gov/forms/form06instructions.pdf>*

**Appellant(s)** *(List each party filing the appeal, do not use “et al.” or other abbreviations.)*

Name(s) of party/parties:

Marion County

Name(s) of counsel (if any):

Jane E. Vetto

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Email(s): jvetto@co.marion.or.us

Is counsel registered for Electronic Filing in the 9th Circuit? ☒ Yes ☐ No

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**Appellee(s)** *(List only the names of parties and counsel who will oppose you on appeal. List separately represented parties separately.)*

Name(s) of party/parties:

Disability Rights Oregon

Name(s) of counsel (if any):

Emily Cooper  
Thomas Stenson

Address: 511 SW 10th Ave., Ste. 200 Portland, OR 97205

Telephone number(s): (503) 243-2081

Email(s): ecooper@droregon.org, tstenson@droregon.org

*To list additional parties and/or counsel, use next page.*

*Feedback or questions about this form? Email us at [forms@ca9.uscourts.gov](mailto:forms@ca9.uscourts.gov)*

Continued list of parties and counsel: *(attach additional pages as necessary)*

**Appellants**

Name(s) of party/parties:

Name(s) of counsel (if any):

Address:

Telephone number(s):

Email(s):

Is counsel registered for Electronic Filing in the 9th Circuit? ☐ Yes ☐ No

**Appellees**

Name(s) of party/parties:

Metropolitan Public Defender  
A. J. Madison

Name(s) of counsel (if any):

Jesse Merrithew

Address: 610 SW Alder St., Ste. 415 Portland, OR 97205

Telephone number(s): (971) 229-1241

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Name(s) of party/parties:

Patrick Allen  
Dolores Matteucci

Name(s) of counsel (if any):

Sheila Potter, Carla Scott, Craig Johnson

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